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January 8, 2021

Via ECF and E-Mail

The Honorable William H. Pauley, III
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Application denied.

SO ORDERED:


WILLIAM H. PAULEY III
U.S.D.J.

Re: *United States v. Kenneth Henderson*
13 Cr. 256 (WHP)

January 8, 2021

Dear Judge Pauley:

I am counsel to Mr. Kenneth Henderson in the above-referenced Violation of Supervised Release proceeding, appointed pursuant to the provisions of the Criminal Justice Act (“CJA”), 18 U.S.C. §3006A. This correspondence is to respectfully request the temporary modification of Mr. Henderson’s bail conditions to permit attendance to the memorial proceedings of his cousin, Mr. Eugene Brown, on January 10, 2021.

Mr. Henderson has been at liberty on a bail package which includes a \$50,000 PRB; co-signed by two FRP’s; with home detention with electronic location monitoring and Probation supervision as directed. Mr. Henderson has been in consistent contact with counsel and Pre-Trial Services.

This application seeks the temporary modification of Mr. Henderson’s above-stated bail conditions, permitting him to attend his cousin’s memorial services. The services will be held on January 10, 2021, from 1:00 to 4:00 p.m., at Benta’s Funeral Home, located at 630 St. Nicholas Avenue, New York, New York. Submitted herewith is an electronic announcement for the memorial services. Accounting for travel time, we are requesting that Mr. Henderson be permitted to leave home at 12:00 noon and return home by 5:00 p.m. In the event that the Court grants the instant request, upon Mr. Henderson’s

return home, the bail conditions currently in place will be immediately reinstated in full force and effect.

Based upon my communications with A.U.S.A. Sarah Mortazavi, the Government opposes this request for the reasons articulated at our last conference.

Therefore, for the reasons stated herein, we respectfully request that the Court grant this application temporarily amending Mr. Henderson's bail conditions.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Richard J. Ma

Richard J. Ma, Esq.

Encl.

cc: A.U.S.A. Sarah Mortazavi (via email)
Probation Officer Washington Herrera (via email)